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20 *Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs*

21 [Additional counsel listed on signature pages]

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

29 IN RE TFT-LCD (FLAT PANEL) ) Case No. 3:07-MD-1827 SI  
30 ANTITRUST LITIGATION ) MDL No. 1827

31 This Document Relates to: ) [PROPOSED] ORDER RE:  
32 All Indirect-Purchaser Actions; ) DISTRIBUTION FROM ESCROW  
33 ) FUNDS FOR NOTICE PROGRAM

34 *State of Missouri, et al. v. AU Optronics* )  
35 *Corporation, et al.*, Case No. 10-cv-3619; ) The Honorable Susan Illston

36 *State of Florida v. AU Optronics Corporation,* )  
37 *et al.*, Case No. 10-cv-3517; and )

38 *State of New York v. AU Optronics Corporation,* )  
39 *et al.*, Case No. 11-cv-0711. )

1        WHEREAS, the Court has before it a motion for preliminary approval of the settlements  
 2 between the Indirect-Purchaser Plaintiffs (“IPPs”) and the States of Arkansas, California,  
 3 Florida, Michigan, Missouri, New York, West Virginia, and Wisconsin (“Settling States”) on the  
 4 one hand, and defendants AUO, LG, and Toshiba (as identified in the respective Settlement  
 5 Agreements, and inclusive of related entities also identified in the respective Settlement  
 6 Agreements; collectively, “Settling Defendants”) on the other hand;

7        WHEREAS, the Settlement Agreements with the Settling Defendants provide that the  
 8 costs of notice of the settlements, as well as administration of the claims process, shall be paid  
 9 from the Settlement Fund of each Settling Defendant, *pro rata*, based on each Settling  
 10 Defendant’s Settlement Amount for a total of \$3,132,594.21);

11        WHEREAS, the cost of notice for media purchases invoiced by Kinsella Media is  
 12 \$2,947,982.00 (see Exhibit 1 attached hereto) and the cost of claims administration invoiced by  
 13 Rust Consulting is \$184,812.21 (see Exhibit 2 attached hereto);

14        WHEREAS, ~~the parties to the Settlement Agreements have determined that~~ <sup>in accordance with</sup> the following  
 15 amounts may be deducted from each Settling Defendant’s Settlement Fund to pay the costs of  
 16 notice and claims administration:

17            LG	\$2,084,738.65
18            AUO	\$932,646.34
19            Toshiba	\$115,209.22
20 <b>TOTAL</b>	<b>\$3,132,594.21</b>

21        WHEREAS, Well Fargo Bank, N.A. has informed the parties that it requires an order  
 22 from the Court before it will distribute the costs of notice and of administration;

23        THEREFORE, IT IS HEREBY ORDERED that Wells Fargo Bank, N.A. shall deduct  
 24 from the Settlement Fund of each Settling Defendant held in escrow the amounts listed above  
 25 and Wells Fargo Bank, N.A. shall then wire **\$2,947,982.00** for the costs of paid media notice to  
 26 the following account:

1 Bank of Texas  
2 ABA/Routing # 111014325  
3 Account # 8093434332  
4 Account Name: Kinsella Media, LLC  
5 Reference # 4497  
6 Federal Tax ID # 52-2301194  
7 Bank Contact: Mayra Landeros, (214) 987-8817

8 Additionally, Wells Fargo Bank, N.A. shall wire **\$184,612.21** for costs of claims  
9 administration to the following account:

10 Bank of Texas  
11 ABA/Routing # 111014325  
12 Account # 8093434387  
13 Account Name: Rust Consulting  
14 Reference # 128325  
15 Federal Tax ID # 41-1813634  
16 Bank Contact: Mayra Landeros, (214) 987-8817

17 The balance of funds in the demand-deposit account, if any, shall be retained for separate  
18 costs associated with the notice plan as they are incurred.

19  
20  
21 **IT IS SO ORDERED.**

22 Dated: 7/27, 2012



23 Hon. Susan Illston,  
24 United States District Judge

25  
26 3235822v1  
27  
28



**INVOICE # 4497***In re TFT-LCD (Flat Panel) Antitrust Litigation*

Job: 2439  
 Date: 7/25/2012  
 Due Date: 8/3/2012

**Bill To:**  
 Josef Cooper  
 Cooper & Kirkham, P.C.  
 655 Montgomery Street, 17th Floor  
 San Francisco, California 94111

**Paid Media Components****Print Media**  
**Magazine(s)**

	<b>Insertions</b>
<i>Newsweek</i>	1
<i>People</i>	1
<i>People</i>	1
<i>Sports Illustrated</i>	1
<i>Time</i>	1

**Newspaper(s)**

<i>El Nuevo Dia</i>	1
<i>El Vocero</i>	1
<i>New York Times (Sunday)</i>	1
<i>Pacific Daily News (Guam)</i>	1
<i>Primera Hora</i>	1
<i>Saipan Tribune</i>	1
<i>Samoa News</i>	1
<i>St. Croix Avis</i>	1
<i>St. Johns Trade Winds</i>	1
<i>Virgin Islands Daily News</i>	1
<i>Wall Street Journal</i>	1

**Newspaper Supplement(s)**

<i>Parade</i>	1
<i>USA Weekend</i>	1

**Broadcast Media****TV**

<i>Broadcast Network/Cable</i>	21
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**Online Media****Web**

<i>24/7 Network</i>	154,693,756
<i>Facebook.com</i>	437,261,431
<i>macworld (Online)</i>	469,792
<i>macworld (Online)</i>	157,000
<i>Microsoft Media Network</i>	51,346,436
<i>NetShelter Tech Network</i>	12,008,501
<i>PCMag.com</i>	2,508,138
<i>pcworld (Online)</i>	468,000
<i>pcworld (Online)</i>	158,777
<i>Pheedo (RSS Feed Advertising)</i>	2,200,427
<i>Quadrant One</i>	26,816,507
<i>Specific Media</i>	45,395,768

**Paid Media Components Total:** **\$2,907,932.74**

**Other Program Components**

<i>Earned Media: Blog Outreach</i>	<b>\$800.00</b>
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**INVOICE # 4497**

<i>Earned Media: Flex Release</i>	\$2,200.00
<i>Earned Media: Social Post</i>	\$150.00
<i>Google Content Network (banner ads)</i>	\$10,000.00
<i>Keyword Search Campaign: KM To Bill Actual Cost</i>	\$15,000.00
<i>Keyword Search Campaign: Set-up and Management Fee</i>	\$750.00
<i>Production and Distribution: Print Ad</i>	\$1,050.00
<i>Production and Distribution: TV Spot</i>	\$9,050.00
<i>Production and Distribution: Web Ad</i>	\$1,050.00
<b>Other Program Components Total:</b>	<b>\$40,050.00</b>

**Current Total Due****\$2,947,982.74****Payment Instructions****Wire Payment to:**

ABA/Routing #(Wire or ACH): 111014325

Account#: 8093434332

Account Name: Kinsella Media, LLC

Reference #: 4497

Bank: Bank of Texas

Bank Contact: Mayra Landeros - 214.987.8817

Federal Tax ID: 52-2301194

**Or Mail Payment to:**

SourceHOV

Attn: Accounts Receivable

2200 Chemsearch Blvd.

Drawer #9065

Irving, Texas 75062

**Media Schedule - July 27, 2012 Approval***TFT-LCD Antitrust Litig. (3 Defendants - Indirect Purchasers)*

7/24/2012

**Paid Media Components****Print Media**

Magazine(s)	Issue Date	Mail/On-sale Date
<i>People</i>	September 3, 2012	August 24, 2012
<i>Newsweek</i>	August 27, 2012	August 20, 2012
<i>Sports Illustrated</i>	September 3, 2012	August 29, 2012
<i>People</i>	September 10, 2012	August 31, 2012
<i>Time</i>	August 27, 2012	August 17, 2012

**National Newspaper(s)**

<i>Wall Street Journal</i>	August 20, 2012	August 20, 2012
<i>New York Times (Sunday)</i>	August 19, 2012	August 19, 2012

**Newspaper Supplements**

<i>Parade</i>	August 26, 2012	August 26, 2012
<i>USA Weekend</i>	August 26, 2012	August 26, 2012

**U.S. Territory Newspaper(s)**

<i>Agana Pacific News</i> (Guam)	Week of August 6, 2012	Week of August 6, 2012
<i>El Nuevo Dia</i> (Puerto Rico)	Week of August 6, 2012	Week of August 6, 2012
<i>El Vocero</i> (Puerto Rico)	Week of August 6, 2012	Week of August 6, 2012
<i>Primera Hora</i> (Puerto Rico)	Week of August 6, 2012	Week of August 6, 2012
<i>Saipan Tribune</i> (Northern Mariana Islands)	Week of August 6, 2012	Week of August 6, 2012
<i>Samoa News</i> (American Samoa)	Week of August 6, 2012	Week of August 6, 2012
<i>St. Croix Avis</i> (St. Croix, U.S.V.I.)	Week of August 6, 2012	Week of August 6, 2012
<i>St. John Trade Winds</i> (St. John, U.S.V.I.)	Week of August 6, 2012	Week of August 6, 2012
<i>St. Thomas News</i> (St. Thomas, U.S.V.I.)	Week of August 6, 2012	Week of August 6, 2012
<i>Virgin Islands Daily News</i> (St. Thomas, U.S.V.I.)	Week of August 6, 2012	Week of August 6, 2012

**Online Media**

	Start Date	End Date
<i>24/7 Network</i>	August 1, 2012	August 30, 2012
<i>Facebook.com</i>	August 1, 2012	August 30, 2012
<i>macworld</i>	August 1, 2012	August 30, 2012
<i>Microsoft Media Network</i>	August 1, 2012	August 30, 2012
<i>NetShelter Tech Network</i>	August 1, 2012	August 30, 2012
<i>PCMag.com</i>	August 1, 2012	August 30, 2012
<i>pcworld</i>	August 1, 2012	August 30, 2012
<i>Quadrant One</i>	August 1, 2012	August 30, 2012
<i>Specific Media</i>	August 1, 2012	August 30, 2012
<i>Keyword Search Campaign</i>	August 1, 2012	na
<i>RSS Feed</i>	August 1, 2012	August 30, 2012

**Broadcast Media**

<i>Network Cable Television</i>	August 13, 2012	August 26, 2012
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**Other Program Components**

<b>Earned Media</b>	<b>Distribution Date</b>
<i>Press Release Distribution</i>	August 1, 2012

**Approval Timing**

KM requires formal engagement by **July 27, 2012** in order to reserve any advertising space.

In order to comply with this schedule, KM must receive approval by the following dates:

- (1) Publication Notice must be approved by **July 27, 2012**.
- (2) Television script must be approved by **July 27, 2012**.
- (3) Web ad must be approved by **July 31, 2012**.





# Invoice

625 MARQUETTE AVENUE, SUITE 880  
 MINNEAPOLIS, MN 55402  
 P 612.359.2000 | F 612.359.2050  
 WWW.RUSTCONSULTING.COM  
 FEDERAL ID #: 41-1813634

DATE: 07/18/12  
 INVOICE #: 128325  
 MATTER #: 8292

TO: Francis D. Scarpulla  
 Zelle Hofmann Voelbel & Mason LLP  
 44 Montgomery Street  
 Suite 3400  
 San Francisco, CA 94104  
fscarpulla@zelle.com  
jdc@coopkirk.com

PROJECT
<i>LCD Indirect</i>
<i>June 2012 Claims Administration Services</i>

Project Setup - Claim Form Mailing	\$ 9,717.40
Claimant Communication/Opt-Outs	405.50
Project Management	5,103.99
Technical Consulting	6,115.80
Telephone Support	584.10
Quality Assurance	237.70
Financial	211.00
Expenses: Other Charges and Out-of-Pocket Costs	<u>1,804.65</u>
Total Invoice	\$ 24,180.14
Outstanding Invoice(s)	<u>\$ 160,632.07</u>
Total Amount Due	<u>\$ 184,812.21</u>

PAYMENT TERMS: NET DUE UPON RECEIPT

WIRE INFORMATION

ACCOUNT #: 8093434387  
 ABA/ROUTING # WIRE or ACH: 111014325  
 BANK: BANK OF TEXAS, DALLAS, TX 75225  
 BANK CONTACT: MAYRA LANDEROS 214.987.8817  
 REFERENCE: INVOICE NUMBER

RUST

LOCKBOX MAILING ADDRESS:  
 P O BOX 142589  
 DRAWER #9051  
 Irving, TX 75014-2589



DATE: 07/18/12  
 INVOICE #: 128325  
 MATTER #: 8292

**STATEMENT OF ACCOUNT**

Current Invoice Period: June 2012 Claims Administration Services

Total Current Invoice	\$ 24,180.14
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OUTSTANDING INVOICES:

Date	Invoice #	Amount	Payments	Balance
02/29/12	128047	17,464.43		17,464.43
03/21/12	128080	66,994.7		66,994.70
04/20/12	128135	42,495.8		42,495.79
05/30/12	128230	15,385.8		15,385.76
06/29/12	128293	18,291.4		18,291.39

PREVIOUS BALANCE DUE	\$ 160,632.07
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Total Amount Due	\$ 184,812.21
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**WIRE INFORMATION**

ACCOUNT #: 8093434387  
 ABA/ROUTING # WIRE or ACH: 111014325  
 BANK: BANK OF TEXAS, DALLAS, TX 75225  
 BANK CONTACT: MAYRA LANDEROS 214.987.8817  
 REFERENCE: INVOICE NUMBER

**RUST**

**LOCKBOX MAILING ADDRESS:**  
 P O BOX 142589  
 DRAWER #9051  
 Irving, TX 75014-2589

**PAYMENT TERMS: NET DUE UPON RECEIPT**